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 Counterclaim-Plaintiffs

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

BOARD OF TRUSTEES OF THE  
 EMPLOYEE PAINTERS' TRUST, et al.,

Plaintiffs,

vs.

OLYMPUS CONSTRUCTION LV, INC., et al,

Defendants.

Case No. 2:24-cv-01023-APG-NJK

**STIPULATION AND ORDER TO  
 EXTEND DEADLINE FOR  
 DEFENDANTS' OPPOSITIONS TO  
 PLAINTIFFS' MOTION TO STRIKE  
 (ECF. NO. 18) AND MOTION TO  
 DISMISS (ECF NO. 19)**

**(First Request)**

OLYMPUS CONSTRUCTION LV, INC., et al.,

Counterclaim-Plaintiffs,

vs.

BOARD OF TRUSTEES OF THE  
 EMPLOYEE PAINTERS' TRUST, et al.,

Counterclaim-Defendants.

Pursuant to Local Rule IA 6.1, the parties, by and through their respective counsel of record, hereby stipulate and request the Court to order that the deadline for Defendants to file their oppositions to Plaintiffs' motion to strike (ECF No. 18) and motion to dismiss (ECF No. 19), which

1 were filed on September 24, 2024, be extended by two (2) weeks to October 22, 2024. In support of  
2 this Stipulation and Order, the parties state as follows:

3 1. Plaintiffs commenced this action June 5, 2024, and service on Defendants took place  
4 thereafter.

5 2. Defendants filed their answers on or about September 3, 2024. Within the answers,  
6 Defendants asserted various affirmative defenses and, in some cases, counterclaims against  
7 Plaintiffs.

8 3. On September 24, 2024, Plaintiffs filed comprehensive motions to strike certain  
9 affirmative defenses and to dismiss the counterclaims asserted against them. Additionally, Plaintiffs  
10 filed a motion to exceed page limits, which Defendants do not plan to oppose.

11 4. Since the filing of the motions, Plaintiffs and Defendants have engaged in the  
12 planning conference mandated by Federal Rule of Civil Procedure 26(f). During that conference, the  
13 parties recognized the comprehensive nature of Plaintiffs' motions, and the additional time needed  
14 for Defendants to evaluate and respond to the motions.

15 5. Additionally, attorney R. Todd Creer noted that one of the attorneys in his office  
16 recently had a baby and additional time was necessary for the oppositions due to addressing  
17 schedules and other deadlines.

18 6. Counsel for Plaintiffs graciously agreed to the requested extension. Thus, all parties  
19 agree to the requested extension.

20 7. This request for an extension of time is not sought for any improper purpose or  
21 other purpose of delay. Rather, it is sought by the parties solely to allow sufficient time for  
22 Defendants to address and respond to Plaintiffs' motions.

23 8. This is the first request for an extension of time of the deadline for Defendants'  
24 oppositions to Plaintiffs' motion to strike and motion to dismiss.

WHEREFORE, the parties respectfully request that the Court extend the deadline for Defendants to respond to Plaintiffs' motion to strike (ECF No. 18) and motion to dismiss (ECF No. 19) from the current deadline of October 8, 2024 to October 22, 2024.

DATED this 8th day of October, 2024.

/s/ Todd Creer

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**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE

DATED: October 9, 2024